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April 30, 1999

4203 '99 MAY 19 P3:15

Dockets Management Branch (HFA-305)
Food and Drug Administration
5630 Fishers Lane, Room 1061
Rockville, Maryland 20852

RE: Docket #98N-1038
Irradiation in the Production,
Processing and Handling of Food

Gentlemen:

The FDA should retain the current labeling law, the current terminology of "treated with radiation" or "treated by radiation," and the use of the radura symbol on all irradiated whole foods. Regarding the issue of labeling, in its initial petition, the FDA concluded that irradiation was a "material fact" about the processing of food, and thus should be disclosed. The material fact remains; therefore, labeling should remain. Consumer acceptability, storage qualities and nutrients are affected. Some irradiated foods have different texture and spoilage characteristics than untreated foods. Whether or not the FDA has approved irradiation as safe, it remains a new technology with no long-term human feeding studies. Consumers certainly have a right to know if this process has been used on their food.

As to the kind of label used, I believe that the label should be large enough to be readily visible to the consumer, on the front of the package. The label contains important information regarding the processing of the contents. For displayed whole foods such as produce, a prominent informational display similar to that used for meats should be used (but containing the term "Irradiation" and the radura). Because of the newness of the technology and the need to assess the public health effects of widespread use of irradiated foods, I believe that the FDA's labeling requirement should not be permitted to expire.

Sincerely,



Cynthia R. Keister

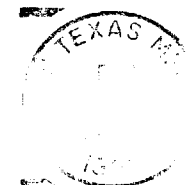
Crk/ck

cc: Kay Bailey Hutchinson
Dick Armey

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